

1 Robert W. Norman, Jr. (SBN 37094)
2 Emilie K. Edling (SBN 45042)
Houser LLP
3 600 University St., Suite 1708
Seattle, WA 98101
4 PH: (206) 596-7838
5 FAX: (206) 596-7839

THE HONORABLE BENJAMIN H. SETTLE

6

7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON AT TACOMA

9

10 In re
11 SARAH HOOVER,
12 Debtor.

USDC Number: 3:21-cv-05154-BHS
Case No.: 19-42890-MJH
Internal Appeal Number: 21-T003
Adversary No.: 20-04002-MJH

14 SARAH HOOVER,
15 Plaintiff,
16 vs.
17 QUALITY LOAN SERVICE
CORPORATION OF WASHINGTON,
PHH MORTGAGE CORPORATION
D/B/A PHH MORTGAGE SERVICES,
HSBC BANK USA, N.A., AS
TRUSTEE OF THE FIELDSTONE
MORTGAGE INVESTMENT TRUST,
SERIES 2006-2, NEWREZ, LLC, AND
IH6 PROPERTY WASHINGTON, L.P.
D/B/A INVITATION HOMES

**UNOPPOSED MOTION FOR
EXTENSION OF DEADLINE TO
FILE REPLY BRIEF**

NOTED: October 15, 2021

WITHOUT ORAL ARGUMENT

23 Defendants.
24

25 ////
26

1 **I. CERTIFICATE OF COMPLIANCE**

2 Pursuant to LR 7(j), counsel for the PHH Mortgage Corporation d/b/a PHH Mortgage
3 Services, NewRez, LLC, and HSBC Bank USA, N.A., as Trustee of the Fieldstone Mortgage
4 Investment Trust, Series 2006-2 (collectively, “Appellants”) conferred with counsel for
5 Sarah Hoover (“Respondent”), and is advised that there is no opposition to this motion.

6 **II. MOTION**

7 Pursuant to Federal Rule of Bankruptcy Procedure (“FRBP”) 9006(b)(1), Appellants
8 respectfully request that this Court extend its deadline to file Appellants’ Reply Brief in this
9 matter by 7 days, such that the new deadline will be October 22, 2021.

10 **III. POINTS AND AUTHORITIES**

11 Appellants request a brief additional extension of time of 7 days to complete and
12 submit their Reply Brief in this matter, such that the new deadline for the Reply Brief in this
13 matter will be October 22, 2021. Despite best efforts, undersigned counsel was out of the
14 office ill part of this week, and therefore requires this brief additional extension to finalize
15 the Reply Brief and allow time for circulation and review before filing. No significant delay
16 of this matter will result from the extension and no party will be prejudiced. In light of
17 Respondents’ consent, Appellant respectfully requests that the Court grant Appellant’s
18 unopposed motion and extend the deadline to file the Reply Brief to October 22, 2021.

19 DATED: October 15, 2021

HOUSER LLP

20 By: /s/ Emilie K. Edling
21 Emilie K. Edling WSBA No. 45042
 eedling@houser-law.com
22 *Attorneys for Defendants PHH Mortgage*
 Corporation, HSBC Bank USA, N.A., as
 Trustee of the Fieldstone Mortgage
 Investment Trust, Series 2006-2, and
 NewRez, LLC

CERTIFICATE OF SERVICE

On October 15, 2021, I served the foregoing document(s): UNOPPOSED MOTION FOR EXTENSION OF DEADLINE TO FILE REPLY BRIEF, in the manner described below:

Jason D. Anderson
Anderson Santiago, PLLC
787 Maynard Ave S., Suite B
Seattle, WA 98104
Jason@alkc.net
Counsel for Plaintiff/Debtor

- CM/ECF
- UPS Overnight
- UPS 2 Day Shipping
- Email
- Courier

Christina L. Henry
Henry & Degraaff, P.S.
119 1st Ave S, Ste 500
chenry@hdm-legal.com
Counsel for Plaintiff/Debtor

- CM/ECF
- UPS Overnight
- UPS 2 Day Shipping
- Email
- Courier

Joseph W. McIntosh
McCarthy & Holthus, LLP
108 1st Ave South, Suite 300
Seattle, WA 98104
jmcintosh@mccarthyholthus.com
Counsel for Quality Loan Service

- CM/ECF
- UPS Overnight
- UPS 2 Day Shipping
- Email
- Courier

John A. McIntosh
Schweet Linde & Coulson, PLLC
575 S. Michigan St.
Seattle, WA 98108
johnm@schweetlaw.com
*Counsel for IH6 Property Washington,
L.P.*

- CM/ECF
- UPS Overnight
- UPS 2 Day Shipping
- Email
- Courier

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 15, 2021

Rachel M. Perez
Rachel M. Perez

Rachel M. Perez